

MEMO ENDORSED

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| ELECTRONICALLY FILED |
| DOC #: |
| DATE FILED: 8/1/18 |

July 31, 2018

VIA ECF

Honorable Richard M. Berman
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

United States v. Usher et al., No. 17-cr-19 (RMB)

Dear Judge Berman:

The parties' motions *in limine* are currently due tomorrow, August 1, 2018 at noon. Defendants respectfully request a one-day extension for the parties to file their motions. The pre-trial hearing in this case, when the motions will be heard, is scheduled for September 13, 2018 at 11:00 a.m.

Defendants have been working diligently to file a single omnibus brief within the 25-page limit. In addition, the parties have engaged in several meet-and-confer sessions over the past three weeks, which have helped narrow the issues. Those discussions have continued until this morning, necessitating this request for an extension of time.

Although the Government opposes this request, Defendants consent to the Government receiving the same one-day extension. If the Court grants this request, the parties can still submit opposition briefs on August 13, pursuant to the current schedule.

Respectfully Submitted:

Heather Tewksbury
Anjan Sahni
Thomas Mueller
*Counsel for Rohan
Ramchandani*

Michael Kendall
Mark Gidley
Andrew Tomback
Counsel for Richard Usher

David Schertler
Lisa Manning
Counsel for Christopher Ashton

cc: Counsel for the Government

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| <u>Extension granted to August 3,</u> <u>2018 at 12:00 noon.</u> | |
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| SO ORDERED: | <i>Richard M. Berman</i> Richard M. Berman, U.S.D.J. |
| Date: <u>8/1/18</u> | |